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Attorneys for Defendant and Counterclaimant
MONTAG DIVULGAÇÃO LTDA.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ROBERT SZEGEDY, an individual,)	Case No.: C 10-05579 EMC
)	
Plaintiff,)	STIPULATION OF DISMISSAL
)	(Fed. R. Civ. P. 41(a)(1)(A)(ii))
v.)	
)	
MONTAG DIVULGAÇÃO LTDA., a Brazilian)	
limited liability partnership; and DOES 1 through)	Hon. Judge Edward M. Chen
100, inclusive,)	
)	Complaint Filed: December 9, 2010
Defendants.)	Counterclaim Filed: September 29, 2011
)	
)	
)	
And Related Counterclaim.)	(E-Filing)

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff/Counter-Defendant ROBERT SZEGEDY, an individual ("Szegedy" or "Plaintiff"), and Defendant/Counter-Claimant MONTAG DIVULGAÇÃO LTDA., a Brazilian limited liability partnership ("Montag" or "Defendant"), hereby agree and stipulate, and give the Court notice, as follows:

WHEREAS, Plaintiff and Defendant have reached a settlement of this dispute; and

NOW THEREFORE, Plaintiff and Defendant, by and through their respective undersigned counsel, hereby stipulate as follows:

1. To dismiss all claims and counter claims pending in this case with prejudice;
2. Each party shall bear its own costs and attorneys' fees; and
3. Plaintiff shall provide a copy of this Stipulation of Dismissal to the World Intellectual Property Organization ("WIPO") and One and One Internet, Inc., the registrar of the <pele.com> domain name (the "Domain Name"), instructing them not to transfer the Domain Name to Defendant pursuant to the WIPO decision issued in Case No. D2010-1533, on November 30, 2010.

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), this action may be dismissed without a Court Order.

SO STIPULATED.

IDELL & SEITEL LLP

Dated: December 14, 2011

By: /Owen Seitel/

Owen Seitel

Elizabeth Rest

Attorneys for Plaintiff Robert Szegedy

LAW OFFICES OF KIRK B. FREEMAN

Dated: December 14, 2011

By: /Kirk B. Freeman/

Kirk B. Freeman

Matthew A. Mallet

Attorneys for Defendant MONTAG DIVULGAÇÃO LTDA.

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ATTESTATION OF CONCURRENCE

I, Owen Seitel, attest that I am one of the attorneys for Plaintiff Robert Szegedy, and as the ECF user and filer of this document, I attest that, pursuant to General Order No. 45(X)(B), concurrence in the filing of this document has been obtained from Kirk B. Freeman, the above signatory.

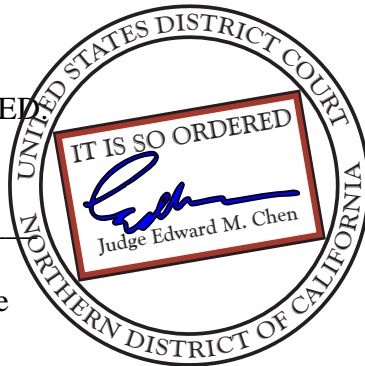
Dated: December 14, 2011

By: /Owen Seitel/

Owen Seitel

IT IS SO ORDERED

Edward M. Chen
U.S. District Judge



PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Idell & Seitel LLP, 465 California Street, Suite 300, San Francisco, California 94104.

On December 14, 2011, at 5:30 a.m./p.m., I served the following document(s):

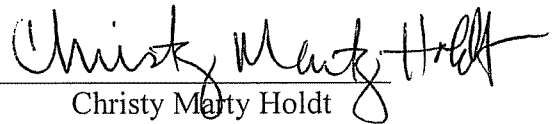
**STIPULATION OF DISMISSAL
(Fed. R. Civ. P. 41(a)(1)(A)(ii))**

☒ by **ELECTRONIC MAIL**. As this case is subject to the United States District Court for the Northern District of California ECF program, pursuant to General Rule 45, upon the filing of the above-entitled document(s) an automatically generated e-mail message was generated by the Court's electronic filing system and sent to the address(es) shown below and constitutes service on the receiving party.

Kirk B. Freeman, Esq.
Matthew A. Mallet, Esq.
Law Office of Kirk B. Freeman
214 Grant Avenue, Suite 301
San Francisco, CA 94108

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and I executed this declaration at San Francisco, California.

Executed on December 14, 2011.


Christy Marty Holdt